

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Javon REED

Case: 2:20-mj-30515

Assigned To : Unassigned

Assign. Date : 12/10/2020

Case No.

Description: RE: JAVON REED  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 9, 2020 in the county of Macomb in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 922(n)

Receipt of a firearm while under indictment

This criminal complaint is based on these facts:

See attached AFFIDAVIT.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.

December 10, 2020

Date: \_\_\_\_\_

City and state: Detroit, Michigan*Complainant's signature*Shannon B. Richardson, Special Agent (ATF)*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT**

I, Special Agent Shannon B. Richardson, being duly sworn, state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since November of 2015. I am currently assigned to the Detroit, Michigan, Field Division, Group 1. I am tasked with investigating violations of Federal firearms and narcotic laws, and have been involved in numerous such investigations. Prior to my employment with ATF, I was employed by the Detroit Police Department for approximately 14 years as a police officer. During that time, I investigated violations of State of Michigan firearms and narcotic laws. In addition, I have completed the Criminal Investigator Training Program, Special Agent Basic Training at the Federal Law Enforcement Training Center, and the Detroit Metropolitan Police Academy. I have participated in numerous investigations involving violations of federal firearms and narcotics laws, resulting in the arrest and conviction of numerous criminal defendants and the seizure of large quantities of firearms. During my employment with ATF, I have participated in various aspects of criminal investigations and used a variety of investigative methods, including interviews, physical and electronic surveillance, confidential informants, and search warrants.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all information known to law enforcement related to this investigation.

3. Probable cause exists that Javon Scott-Allen REED (DOB: xx/xx/2001), received a firearm while under indictment, in violation of 18 U.S.C. § 922(n).

#### **INVESTIGATION AND PROBABLE CAUSE**

4. During August and September 2020, ATF Special Agents conducted an investigation that involved firearms trafficking. The investigation involved firearms allegedly stolen from a home and resold on the street. Javon REED was developed as a suspect involved with the stolen firearms.

5. During the month of September 2020, I contacted the Detroit Police Department, in furtherance of the stolen firearms investigation. I asked for information about Javon REED. In part, I requested reports related to police contact, firearms, and his relevant addresses.

6. In September 2020, I reviewed REED's computerized criminal history. In September of 2019, REED was placed on state HYTA probation for two felonies;

Carrying a Concealed Weapon and Resisting and Obstructing a Police Officer. On September 30, 2020, I spoke with Michigan Department of Corrections (MDOC) Parole Officer Theresa Krzyzak. Agent Krzyzak indicated that Javon REED was currently on probation with MDOC with a discharge date of September 11, 2021. REED also has an outstanding probation violation warrant. REED is currently prohibited from possessing, owning, using, or having control of a weapon. Additionally, REED must not be in the company of anyone he knows to possess those items.

7. Based on the information provided by the Detroit Police Department and other investigative means, on December 7, 2020, a federal search warrant was issued for 8092 Coolidge, Center Line, Eastern District of Michigan, REED's current residence.

8. On December 9, 2020, state and federal law enforcement executed the federal search warrant. A search of the residence revealed one Glock, model 17 Gen 5, 9mm, handgun, serial number: BNHP019. The Glock was located in the basement inside of a washing machine.

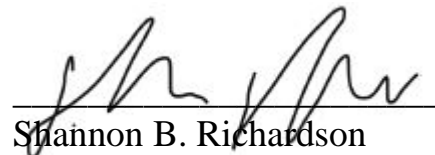
9. During the search of the premises, REED was advised of his Miranda Rights, waived his rights, and agreed to answer law enforcement's questions. REED indicated to agents that he put the aforementioned firearm in the washing machine when he saw police outside of his residence.

10. I provided images of the Glock seized from 8092 Coolidge, Center Line, to a representative from Glock. After reviewing the images and running the firearm's serial number, BNHP019, Glock indicated that the firearm was manufactured in Austria on May 28, 2020. Therefore, REED had to have received the firearm after he was already placed on HYTA probation. As a result, REED received the firearm while under indictment. Further, the aforementioned firearm was manufactured outside of the state of Michigan and is a firearm as defined in 18 U.S.C., Chapter 44, Section 921(a)(3).

### CONCLUSION

11. Probable cause exists that Javon REED received a firearm while under indictment, in violation of Title 18 U.S.C. § 922(n).

Respectfully Submitted,

  
Shannon B. Richardson  
Special Agent, ATF

Sworn to before me and signed in my  
presence and/or by reliable electronic means.

s/David R. Grand  
DAVID R. GRAND  
UNITED STATES MAGISTRATE JUDGE